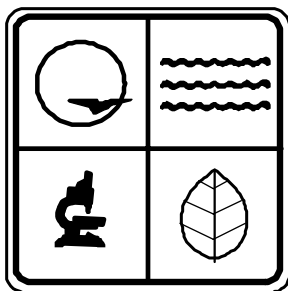


Report to the Governor

Missouri Public Water System Capacity Development



**Missouri Department of Natural Resources
Division of Environmental Quality
Water Protection Program**

September, 2005

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Public Access to This Report

This report will be made available to the public through the Missouri Department of Natural Resources' (MoDNR) website, internet links with the technical assistance providers, the U.S. EPA, and publication of announcements in the *Water and Wastewater Digest*, *On TAP*, and other trade publications. MoDNR will also issue a news release to newspapers statewide.

Definition of Terms

Capacity Development - Capacity development is a State effort to help drinking water systems improve their technical, financial, and managerial operations so they can provide safe drinking water consistently, reliably, and cost-effectively.

Community Water System (CWS) – A public water system which serves at least fifteen (15) service connections and is operated on a year-round basis or regularly serves at least twenty-five (25) residents on a year-round basis.

Nontransient Noncommunity Water System (NTNCWS) – A public water system which that is not a community water system and that regularly serves at least twenty-five (25) of the same persons over six (6) months per year.

Public Water System (PWS) – A system for the provision to the public of piped water for human consumption, if the system has at least fifteen (15) service connections or regularly serves an average of at least twenty-five (25) individuals daily at least sixty (60) days out of the year. The system includes any collection, treatment, storage or distribution facilities used in connection with the system. A public water system is either a community water system or a noncommunity water system.

Sanitary Survey – An on-site engineering inspection and review of a public water system – its supply source(s), treatment of supply source(s), treatment facilities and distribution system(s), for the purpose of evaluating their adequacy, reliability and safety for producing and distributing drinking water.

Significant Non-complier (SNC) – Those violators which present the greatest risk to public health and which, therefore, are generally primary enforcement targets.

Technical, Managerial and Financial (TMF) Capacity - Technical capacity refers to the physical infrastructure of the water system, including but not limited to the adequacy of the source water, infrastructure (source, treatment, storage, and distribution), and the ability of system personnel to implement the requisite technical knowledge. Managerial capacity refers to the management structure of the water system, including but not limited to ownership accountability, staffing and organization, and effective linkages to customers and regulatory agencies. Financial capacity refers to the financial resources of the water system, including but not limited to revenue sufficiency, credit worthiness, and fiscal controls.

Introduction

On August 6, 1996, Congress and the President enacted sweeping amendments to the federal Safe Drinking Water Act (SDWA). The intent of the amendments is to improve public health protection by addressing four main themes: public notice and awareness, the use of sound science in regulatory development, funding for states and communities to improve public health protection through the establishment of the Drinking Water State Revolving Fund capitalization grant, and preventing contamination of drinking water sources through source water protection and improved water system capacity. Capacity, as used in this context, is the process of water systems acquiring and maintaining adequate technical, managerial and financial capabilities to ensure that they consistently achieve the public health objectives of the SDWA and regulations.

Pursuant to Section 1420 of the SDWA, States are required to develop and implement a capacity development strategy to assist community and nontransient noncommunity water systems that are in significant noncompliance in acquiring and maintaining technical, managerial and financial capacity that will bring them back into compliance with the SDWA.

Not later than two years after EPA has approved a State's capacity development strategy, and every three years thereafter, the state agency responsible for implementing the SDWA must submit a report to the Governor on the efficacy of the strategy and progress made toward improving public water systems' technical, managerial, and financial capacity. The report must also be made available to the public.

Missouri's strategy was approved by the U. S. Environmental Protection Agency (EPA) on September 14, 2000. The first Report to the Governor was provided in 2002. This is the second Report to the Governor on Missouri's capacity development strategy.

Missouri Capacity Development Strategy

Development

Staff of the Missouri Department of Natural Resources' Public Drinking Water Program (PDWP) initiated a stakeholder effort in 1998 to gather input from a broad spectrum of public interest groups, drinking water industry associations, funding agencies, technical assistance providers and environmental groups. The PDWP conducted an extensive mailing to solicit interest in participating in the stakeholder meetings and provided public notice in accordance with the Missouri "Sunshine Law." Organizations and agencies invited to participate are listed in Appendix 1. The PDWP contracted with a professional facilitator from the Boise State University's Environmental Finance Center to facilitate the stakeholder meetings.

Workgroup Recommendations

The 1989-1999 workgroup recommended ten elements for improving the technical, managerial and financial (TMF) capacity of public water systems. Implementation of these elements is an on-going process that continues to be refined and improve each year.

Table 1. Capacity Development Strategy Elements

1.	Improve water system knowledge of current and future rules and regulations
2.	Improve communication and trust between EPA, PDW and the water system
3.	Provide public education to Missouri citizens of the importance of safe drinking water
4.	Encourage peer resource sharing
5.	Encourage partnerships between agencies and systems
6.	Improve interagency communication for TMF capacity related programs
7.	Coordinate capital resources
8.	Establish and implement a rate setting mechanism for sustaining fiscal health of water systems
9.	Increase planning in rural areas
10.	Develop and provide board member training and TMF Capacity materials to managers

Continued Refinement of the Strategy

DNR staff holds stakeholder meetings on an annual basis to revisit the Capacity Development Strategy and discuss on-going issues and ideas. At the 2004 stakeholder meeting, the stakeholders revisited each of the ten elements in the original strategy. They revised several elements in the original Strategy. The revised Capacity Development Strategy Elements are in Table 2.

Table 2. Capacity Development Strategy Elements (Revised 2004)

1.	Improve water system knowledge of current and future rules and regulations
2.	Improve communication and trust between EPA, PDW and the water system
3.	Provide public education to Missouri citizens of the importance of safe drinking water, working within the constraints imposed by DNR
4.	Encourage partnerships between agencies and systems
5.	Improve interagency and intra-agency communication for TMF capacity related programs
6.	Coordinate capital resources
7.	Continue rate setting and financial management training for small systems
8.	Increase planning in rural areas
9.	Develop and provide board member training and TMF Capacity materials to managers
10.	Establish a base-line to measure the success of TMF capacity activities

Strategy Implementation and Efficacy

Public Drinking Water Branch

The Public Drinking Water Branch (PWDB) is responsible for implementing the Capacity Development Strategy. Continued implementation of the Strategy is required in order for Missouri receive its full allotment of the Drinking Water State Revolving Fund capitalization grant from EPA. The DWSRF grant is used to provide low-interest capital improvement loans to public water systems and to fund the public drinking water protection effort in Missouri, including but not limited to capacity development activities.

Compliance Assistance and Enforcement

In accordance with the Capacity Development Strategy, the PDWB prioritizes systems based on their record of compliance. The first systems to receive technical, managerial and financial capacity assistance are systems in significant non-compliance with regulatory requirements.

As an initial step, a hierarchy of violation types, based on public health risk, was developed. Systems are ranked according to the relative seriousness of the problem(s) and the associated risk(s). Prior to enforcement action and referral to the Missouri Attorney General's Office (AGO), public water system owners are offered the opportunity to participate in a voluntary compliance process. The system owner signs a Bilateral Compliance Agreement (BCA) that specifies actions to be taken and a timeframe for the system to return to compliance. Technical, managerial, or financial assistance may be provided. If the system does not return to compliance, or show progress toward compliance, the department may proceed with enforcement action or referral to the AGO.

The department's Regional Offices provided on-site TMF assistance to these systems in an effort to help them return to compliance. Other technical assistance organizations, such as Midwest Assistance Program (MAP), Missouri Rural Water Association (MRWA), and the department's Outreach and Assistance Center (OAC), provided additional support with TMF activities. Coordinated efforts between the PDWB, the Department of Economic Development, and the

U.S. Department of Agriculture, which comprise the Missouri Water and Wastewater Review Committee, led to many state- and federally-funded projects to resolve compliance problems and, in many cases, led to regional water systems with adequate TMF capacity.

For the past 11 years on a quarterly basis, the PDWB has listed systems that are persistently non-compliant in statewide news releases to advise the public of this noncompliance with drinking water regulations.

An on-going goal of the PDWB is to inform water system owners and operators of the impact of future regulatory requirements and to assist them in meeting those requirements before they become effective. This process has proven to be extremely effective and most of the systems have made significant progress to come into compliance with more stringent regulatory requirements they are facing.

Construction Authorizations and Permits to Dispense

The PDWB is responsible for issuing construction authorizations for community and non-community systems. A “TMF Checklist” for Construction Authorization and Permit to Dispense Water to the Public and an Owner’s Acknowledgement Statement (see Appendix 2) is used during the review of permit applications to ensure all the TMF requirements of 10 CSR 60-3.030 are met. The PDWB engineers review each application to make certain the information required on the TMF Checklist is provided and the Owner’s Acknowledgement Statement is signed and included in the submittal.

The required information includes two copies of an engineering report, two copies of the engineering plans and specifications, one application signed by the owner/president (continuing operating authority), TMF requirements of 10 CSR 60-3.030 as specified on the Checklist, and a signed Owner’s Acknowledgement Statement. The items on the TMF Checklist marked with asterisks may be submitted during or after construction, but must be completed before the PDWB will issue a Permit to Dispense Water to the Public.

The financial capacity demonstration may be done per items on page 3 of the TMF Checklist, or may be provided by utilizing the Missouri Water System Financial Capacity Worksheet (see Appendix 3). If a proposed water system goes through the Missouri Water and Wastewater Review Committee and obtains funding, the financial evaluation by the Committee is accepted. The majority of the systems demonstrate the financial capacity using this Worksheet. The PDWP requires the Owner’s Acknowledgement Statement prior to issuing a Permit to Dispense Water. The water system owner(s) must sign the form and send it to the PDWB for verification that he/she is aware of the TMF capacity requirements and the need to maintain those requirements.

Table 3. TMF Reviews for New Water Systems, 1999-2005

Summary of TMF Reviews for New Water Systems (October 1 through September 30)			
Time Period	Total Approved for Construction Authorization	Total Approved for Permit To Dispense	Under Construction or Serve a Population <25 and <15 Connections
1999-2000	13	1	12
2000-2001	17	2	15
2001-2002	11	4	7
2002-2003	24	2	22
2003-2004	16	2	14
2004-2005	14	4	3
TOTAL	95	15	73

Engineering Contract Services

The PDWB assists very small community water systems improve their TMF capacity by providing funding for engineering contract services (engineering report studies). Priority is based primarily on compliance information and infrastructure conditions and capacity, along with the willingness of the systems' owner to look at consolidation options, whether physical or operational/managerial. Small system infrastructure problems are most commonly related to lack of financial planning and operation and maintenance, and, in most cases, these are the cause of non-compliance. Engineering contract services provide these very small systems with the funding to have an entire system evaluation performed, considering all options including consolidation with nearby water systems.

The Contract for Engineering Services also assists small water systems with obtaining funding for project development, as there is a requirement for systems to apply to the Missouri Water and Wastewater Review Committee (MWWRC) for project development and construction funding. The MWWRC is comprised of all the state and federal funding agencies within Missouri and includes the department's DWSRF Loan Program, the department's PDWB Rural Water Grant and Loan Program, the Missouri Department of Economic Development's Community Development Block Grant Program, and the U.S. Department of Agriculture's Rural Development Program. Uses of the money may include consolidating with another system, upgrading the source, treatment, storage, and distribution systems, and other measures to bring the system into TMF compliance. The MWWRC meets twice per month to discuss all project applicants' needs and possible funding options to best fit those needs.

For each fiscal year, applications for Engineering Contract Services are mailed to all municipalities and public water supply districts serving 10,000 or less in population. The application is very brief and coordinates with the DWSRF application by assigning priority points for certain issues that a system may have (i.e., lack of storage, lack of capacity, security). The PDWB reviews the applications and makes grant awards for a maximum amount of \$7500 each. The payments are made in 25% increments with the final payment not being made until after the submitted engineering report has been approved.

The PDWB has provided funds to 66 small water systems through the Engineering Contract Services from FY2000 to FY2005. Of the 66 systems, 41 have applied to the MWWRC for loan or grant funding to address their problems. Twenty-one have been funded for project development and approximately six are currently being evaluated for project development funding.

This program has resulted in many small water systems with compliance problems connecting to larger, viable systems, the formation of regional water systems to eliminate small systems with significant non-compliance problems, and small systems obtaining managerial and financial capacity to address their technical needs. This information, by entity, is provided in Appendix.4.

Electronic Sanitary Surveys

PDWB is developing an electronic sanitary survey to obtain real-time data and eliminate much of the paperwork that impedes the department from staying up-to-date in regard to water system information. This survey will create a database where specific information can be pulled up immediately, such as TMF capacity items, security items, compliance, etc. It will allow Geographic Information System data to be integrated and downloaded, as well as DWSRF program information, and will improve quality control/quality assurance issues between the department's regional offices. Sanitary surveys are the primary mechanism by which the department evaluates the TMF of water systems once they are in operation.

Emergency Response Plans

The PDWB contracted with Missouri Rural Water Association (MRWA) to provide on-site evaluations of public water system emergency response plans (ERP), which are required by the federal Bioterrorism Act of 2002. All systems serving 3,301-50,000 population will be assisted by MRWA. If a system does not have an adequate emergency response plan in accordance with EPA guidance, the department will provide the water system assistance in completing their ERP to meet the requirements prior to November 30, 2005. A checklist was developed to assess the quality of the ERP and the water system staff's knowledge of the plan. The checklist of items obtained from the systems is available in the appendix. MRWA staff will also assess training needs while on-site.

Source Water Protection

Protecting and insuring the quality and quantity of water available is a vital management function for any water system. The PDWB held one-day training classes on Source Water Protection and System Security at each of DNR's Regional Offices, and two-and-a-half-day classes that presented information on the Clean Water Act and other laws for Watershed Protection. These classes were attended by 150 people. Additionally, department staff has provided presentations on source water assessments and plans at technical conferences. Providing source water protection training and information helps public water system staff develop and maintain system TMF capacity by increasing their understanding of the relationship between preventing contamination of their source water and the technical and financial impacts on their system.

The PDWB has done water supply studies for 34 surface water supplies to determine the firm yield of their water sources in a multiple-year drought. Through these studies we identified those water systems in peril due to inadequate storage in their reservoirs or inadequate flow in their supplying streams. We also identified some systems as being marginal in their capacity to provide water during a drought and those systems that have adequate supplies. Our regional office staff are working with these water systems. In most cases, the solution has been the utilization or creation of a regional water supply.

Our Conservation Reserve Enhancement Program will extend the usable life of drinking water reservoirs by reducing the sediment entering the lakes. Seventeen water systems are participating in this voluntary program. Over 15,000 acres within participating watersheds have been taken out of row-crop agriculture and reserved for wildlife habitat for 15 years.

Regional Offices

Every Regional Office in the department has staff who assist water systems with Capacity Development. Systems with a potential for problems in meeting the requirements of future regulations, as indicated by operational test data collected, receive technical assistance from the department's Regional Offices. The PDWB collects data from water systems and provides a list of systems facing future non-compliance with upcoming regulatory requirements to the Regional Offices quarterly. The Regional Offices provide assistance through on-site visits, priority inspections and training programs to the specific systems to help them meet the future regulatory requirements.

One goal of the PDWB is to inform water systems of future regulatory requirements and assist them in meeting more stringent requirements before they become effective. This process has proven to be extremely effective and most of the systems have made significant progress to come into compliance with more stringent regulatory requirements they are facing.

Continuous tracking of systems is performed by coordination between the PDWB and the Regional Offices. Hard copies of all of the project receipt letters, comment letters, approvals and TMF Checklists are provided to the Regional Office staff assigned to capacity development. An updated list of all new systems is maintained at the PDWB and sent to the Regional Offices twice a year for future inspections and to check on construction status of systems with construction authorization over two years. This list allows the regions to know which systems are to receive a TMF assessment during their sanitary survey. Sanitary Surveys are performed every three years for community water systems and every three to five years for non-transient, non-community water systems, depending on the level of treatment they provide. TMF capacity assessment as part of the Sanitary Survey is extremely beneficial to both compliant and non-compliant systems in ensuring TMF capacity.

Regional office staff perform a Compliance Assistance Visit (CAV) within 30 days of initial start-up of a facility with a newly-issued permit or upon program request. If a permittee has multiple facilities of a like nature, CAV's may not be necessarily conducted at each.

CAV's will be conducted primarily to provide technical assistance. The inspector will confirm that the facility has a copy of the permit or registration, explain the general provisions of the permit or registration, and advise the facility of what is required to comply with these requirements and other related state and federal requirements. Special emphasis will be given to any permit limits, monitoring, record keeping, or reporting requirements. Permittees will be urged to comply with all parts of the permit, encouraged to ask questions, will be provided with further contact information, and will be encouraged to make these contacts.

CAV's are not intended to initiate enforcement action except when conditions exist which may be immediately dangerous to human health or the environment, or where a federal requirement to initiate a formal enforcement action exists. If serious violations are encountered, regional and/or enforcement staff will provide all assistance possible to bring the facility into compliance without imposing penalties or other sanctions.

Division of Geology and Land Survey

Entities interested in drilling a new well in Missouri are required to contact the department's Division of Geology and Land Survey prior to construction. DGLS is responsible for approving the well site and also provide the proper casing depths for the well. The surveys conducted by DSLG are critical in preventing the construction of a non-community well when it should be a community well, and also the prevention of private well construction when it should be either a community or non-community well. This helps ensure the technical capacity of the system. Also, by contacting DGLS, the owner knows what requirements are necessary up-front, before any cost is incurred, thus providing help with financial capacity, as well.

Community Assistance Office

The department's Community Assistance Office provides assistance with technical, managerial and financial capacity, board member training, and operator certification. The Show-Me Ratemaker Software and user charge analysis services serves as a financial capacity assessment tool and assists compliant and non-compliant systems with planning for current and future needs. The Show-Me Ratemaker Software, TMF Capacity Checklist, EMI Workshop Information and other services provided by the office are located on the Department's internet site at <http://www.dnr.mo.gov> and may be accessed directly from the Community Assistance Office Internet site at <http://www.dnr.mo.gov/oac/index.html>. The Office's "Tap into DNR" newsletter, which is distributed quarterly to community leaders, contains at least one article related to water system capacity development in each issue.

The department's Operator Certification Program has incorporated TMF capacity rule training into the Operator Certification training program. In FY2005, over 9000 attended 612 eligible courses where TMF issues were addressed. Continuing Education Units (CEUs) are offered for attendance at capacity development-related training in order for operators to maintain their Operator Certification License. All of the assisting agencies and organizations offer CEUs as part of their training programs, which encourages and increases their attendance. The department has elected to use a voucher system to implement to assist system with capacity

training. Vouchers are department-issued forms made available to eligible water systems. They can be used to pay for operator certification fees and eligible drinking water training fees.

With the organizational changes that are occurring in the department, the Community Assistance Office's functions may be shifted to the department's Regional Offices.

Technical Assistance Providers

Technical assistance providers, such as the Missouri Rural Water Association, Midwest Assistance Program, and the American Water Works Association play a vital role in helping water system owners and operators meet TMF capacity needs. Approximately 90% Missouri's 2,700 public water systems have a population of 3,300 or less. These small public water systems are less likely than larger systems to have the independent means to develop and maintain technical, managerial and financial capacity. With about 2,525 public water systems falling into this small system category, the workload on state staff would be overwhelming. The technical assistance providers have been a valuable asset in increasing the amount of TMF assistance provided to systems in significant noncompliance and have worked well with the PDWB and the Regional Offices in identifying issues and finding solutions.

The technical assistance provided by these organizations includes, but is not limited to, on-site assistance, board member meetings, operator and board member training, financial capacity assistance and rate setting, assisting system owners with grant and loan applications, regionalization efforts, and educational outreach.

Missouri Rural Water Association (MRWA)

The department and the Missouri Rural Water Association (MRWA) have developed an excellent working relationship over the years in assisting public water systems across Missouri. MRWA is very active, both on-site and off-site, in helping build systems that have technical capacity. Since 1966, the MRWA has provided on-site training and technical assistance to Missouri water and wastewater providers. Since implementation of the TMF program in late 2000, MRWA has shifted its training emphasis to cover more management and financial issues without shortchanging its on-site technical assistance efforts.

During FY2005, MRWA performed approximately 1,365 hours of on-site assistance. This consisted of 64% technical, 21% managerial and 15% financial-related assistance. MRWA provided approximately 530 hours of formal classroom training, of which about 55% was technical in nature, 25% managerial and 20% financial training. Approximately 25% of all courses were aimed at very small water systems serving 200 connections or less.

Midwest Assistance Program (MAP)

The department has also enjoyed an excellent working relationship with the Midwest Assistance Program (MAP). MAP has provided assistance to small public water systems in Missouri as well as neighboring states for many years. They have incorporated technical, managerial and financial assistance into their work with privately-owned public water systems as well as publicly-owned systems. PDWB routinely provides MAP with lists of water systems in need of assistance, and MAP staff use this list to plan and prioritize their efforts.

MAP's assistance includes: helping water systems with loan and grant applications, developing rate structures, evaluating community water system TMF capacity, preparing emergency management plans, providing operator training on regulatory requirements, negotiating utility water purchase/regionalization projects, conducting needs assessments, conducting board member training, evaluating operation and maintenance, assisting utility staffing and start-up plans, monitoring construction projects, and facilitating regionalization efforts and education programs.

Missouri Section American Water Works Association (AWWA)

The AWWA also provides outreach and assistance, primarily to medium- and large-sized water systems. The PDWB has provided articles on capacity development for publication in several AWWA publications and has provided training at AWWA conferences. AWWA incorporates capacity development into their training programs for operators and managers. Members of AWWA consist of many consulting firms, medium and large water systems, and equipment providers, who are not likely to be reached by other assistance organizations.

Continued Implementation of the Capacity Development Strategy

Of the elements listed in Table 2, various outside agency technical assistance providers will be able to proceed with meeting the following elements of the Capacity Development Strategy regardless of the changes within the structure of the department. These elements are:

- Improve water system knowledge of current and future rules and regulations
- Provide public education to Missouri citizens of the importance of safe drinking water,
- Encourage partnerships between agencies and systems,
- Coordinate capital resources, and
- Increase planning in rural areas.

The remaining elements of the Strategy will be difficult to continue implementing on a statewide level until more priority is given to the capacity development program.

Future Capacity Development Activities

The department is committed to continuing to enhance its capacity development program in order to ensure that it is providing optimal assistance to public water system owners and operators as they strive to provide safe drinking water to the public.

On-site Training Unit

The department is exploring the benefits of developing a mobile training unit that would provide on-site, one-on-one capacity development training to operators, owners, and board members. The training unit would be set up as a classroom. The course curriculum would cover technical information and training from point "A" (the water source) through filtering, chemical treatment, chlorination, and out to the distribution system. Once set up, the operator would be able to see the whole water treatment system process, including filter backwash.

Disadvantaged Community Loans

The department is also exploring adding disadvantaged community loans to the Drinking Water State Revolving Fund loan program. These loans would be available to small community and nontransient noncommunity water systems serving less than 3,301 persons in areas that meet disadvantaged community criteria to be established by the state. The federal Safe Drinking Water Act allows for such loans to include a “negative interest” rate, principal forgiveness and up to a 30-year repayment terms. The money for these loans would come directly out of the capitalization grant.

Public Water Supply Capacity Survey

The department is also considering sending out surveys to all public water systems serving 10,000 or less in population. This survey, modeled after the State of Kansas’ survey, would seek to identify systems in most need of assistance to improve their TMF capacity. The department would use the survey to guide its development of appropriate programs to assist these systems. A copy of the Kansas Survey is in Appendix 6.

Baseline

One of the goals for the upcoming year is to establish a baseline so that future measurements of the success of the TMF programs can more readily seen. The department will also continue establishing electronic sanitary surveys that will provide real-time data on systems.

Conclusion

The department continues to strive to improve the TMF capacity of Missouri’s public water systems. Each year more owners and operators are being educated on the importance of providing safe water to their consumers and how to provide safe water. The department continues to explore and develop additional methods of providing this education to water system owners.

Appendix 1 – Missouri Capacity Development Strategy
Workgroup/Advisory Committee

MISSOURI CAPACITY DEVELOPMENT STRATEGY WORKGROUP/ADVISORY COMMITTEE
United States Environmental Protection Agency
Missouri Department of Health and Senior Services
Midwest Assistance Program
Clarence Cannon Wholesale Water Commission
Missouri Water and Wastewater Conference
Missouri Rural Water Association
American Water Works Association
National Association of Water Companies
Missouri Public Service Commission
Missouri – American Water Company
Consolidated Public Water Supply District #2 of Lafayette, Johnson and Saline Counties
Missouri Department of Economic Development – Community Development Block Grant Program
United States Department of Agriculture – Rural Development Program
Association of Missouri Electric Cooperatives
League of Women Voters
Boone County Public Water Supply District #9
City Utilities of Springfield
Safe Drinking Water Commission
Missouri Association of Municipal Utilities
Association of Metropolitan Water Agencies
MDNR Public Drinking Water Branch (formerly Public Drinking Water Program)
MDNR Regional Offices
MDNR Water Pollution Control Branch (formerly Water Pollution Control Program)